

---

From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
Subject: RE: Dark Green  
Date sent: Mon, 30 Jun 2003 09:33:58 -0500

I like your "definition". I'll be running the Product Outline by her before the focus group anyway. Thanks.

-----Original Message-----

**From:** Cunningham, Gary  
**Sent:** Monday, June 30, 2003 9:59 AM  
**To:** Gundal, Frank  
**Subject:** RE: Dark Green

Since Penny was the one who brought that term to the group, should we ask her where she heard it?

-----Original Message-----

**From:** Gundal, Frank  
**Sent:** Monday, June 30, 2003 9:57 AM  
**To:** Dishaw, J David; Cunningham, Gary  
**Subject:** Dark Green

Do either of you have a formal definition of dark green that we can use for the focus groups?

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00001

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From: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
To: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
Subject: RE: Dark Green  
Date sent: Mon, 30 Jun 2003 09:26:51 -0500

Frank:

I did some checking and the idea behind "Dark Green" seems to be more of a concept than a strictly defined product. The concept is that there are fundamental differences within renewable energy sources, where the better, or "greener" sources have little or no effect on the environment, while the other "light green" sources although "renewable" by definition, might still have emissions or other residual effects on the environment.

Below is a sample list (by one person's definition) of what sources fall into each category:

Light Green:

- Sewer Gas
- High Hydro
- Trash Burning
- Landfill Gas
- Biomass

Dark Green:

- Solar
- Wind
- Geothermal
- Low Impact Hydro
- Tidal

Hope this helps

Gary

-----Original Message-----

**From:** Gundal, Frank  
**Sent:** Monday, June 30, 2003 9:57 AM  
**To:** Dishaw, J David; Cunningham, Gary  
**Subject:** Dark Green

Do either of you have a formal definition of dark green that we can use for the focus groups?

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00002

---

From: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
To: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
Subject: RE: Dark Green  
Date sent: Mon, 30 Jun 2003 08:58:46 -0500

Since Penny was the one who brought that term to the group, should we ask her where she heard it?

-----Original Message-----

**From:** Gundal, Frank  
**Sent:** Monday, June 30, 2003 9:57 AM  
**To:** Dishaw, J David; Cunningham, Gary  
**Subject:** Dark Green

Do either of you have a formal definition of dark green that we can use for the focus groups?

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00003

---

From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Dishaw, J David" <J\_David\_Dishaw@nstaronline.com>, "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
Subject: Dark Green  
Date sent: Mon, 30 Jun 2003 08:57:09 -0500

Do either of you have a formal definition of dark green that we can use for the focus groups?

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00004

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From: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
To: "Martin, Robert" <Robert\_Martin@nstaronline.com>  
Subject: FW: Green Power  
Date sent: Mon, 30 Jun 2003 06:23:24 -0500

Any suggestions where I can get them the pricing data they need?

-----Original Message-----

**From:** Gundal, Frank  
**Sent:** Friday, June 27, 2003 4:49 PM  
**To:** Cunningham, Gary  
**Cc:** Razzaboni, James; Barsamian, Peter  
**Subject:** Green Power

Gary,

We're meeting with the person conducting the focus groups next Wed at 2:00 in SW3F (you're welcome to attend if you'd like). We'll need the pricing information that we spoke about in the last meeting. Could you please fill it out on the attached and send back to me. Please also review what I've written so far and send me any comments.

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00005

# Green Power Option

## Product Description

By choosing this product, customers will be able to increase the amount of Green Power used to generate the electricity, which they use. In doing so they will help the local environment by reducing emissions and reducing our dependence on natural resources. The additional cost to choose green power is tax deductible (state).

Customers may begin or end purchasing Green Power by specifying an option on their electric bill. The Green purchase will begin or end on the following billing cycle.

Choosing Green Power in no way changes the reliability or quality of service.

## Product Pricing

25%

50%

100%

Dark Green

25%

50%

100%

## Product Marketing

Customers may receive information about this product from the following sources –

- Bill Insert
- Radio
- TV
- Co-operative partnerships with local retail establishments
- Co-Operative partnerships with local towns and communities

## Green Definition

There are various definitions of Green Power. NSTAR's Green Power program will be supplied by those sources approved by the Massachusetts Technology Collaborative, a quasi-public agency established as the state's development agency for renewable energy.

## MTC Glossary of Renewable Energy Sources

### Wind Energy

Wind Energy comes from moving air which is converted to electric power to create electricity. Due to unequal solar heating of the earth, wind is generated. As air flows past the rotors of a wind turbine, the rotor spins and drives the shaft of an electric generator. Wind turbines with small rotors are often used for battery charging while larger rotors are used to generate large amounts of electricity that can be used locally or fed into the regional grid.

### Biomass

Biomass energy available from organic materials in the environment, that originated as solar energy that is absorbed by plants and is converted into chemical energy by photosynthesis. It includes energy available in wood, crops, crop residues, industrial and municipal organic waste, food processing waste and animal wastes. These wastes of various human and natural activities can be burned to create heat and/or steam that is used to generate electricity.

## **Solar photovoltaic**

Solar Electric or Photovoltaic Systems convert some of the energy in sunlight directly into electricity. Photovoltaic (PV) cells are made primarily of silicon, the second most abundant element in the earth's crust, and the same semiconductor material used for computers. When the silicon is combined with one or more other materials, it exhibits unique electrical properties in the presence of sunlight. Electrons are excited by the light and move through the silicon. This is known as the photovoltaic effect and results in direct current (DC) electricity.

## **Landfill gas**

Landfill gas is created when waste in a landfill decomposes under anaerobic – or oxygen free – conditions. Because landfill gas is about 50 percent methane, it can be used as a source of energy similar to natural gas (which is about 90% methane). Since landfill gas is generated continuously, it provides a reliable fuel for a range of energy applications, including heating and electric power generation.

## **Hydropower**

Hydroelectric (or Hydropower) plants capture the kinetic energy of falling water to generate electricity. A turbine and a generator convert the energy from the water to mechanical and then electrical energy. The turbines and generators are installed either in or adjacent to dams, or use pipelines (penstocks) to carry the pressured water below the dam or diversion structure to the powerhouse. Hydropower projects are generally operated in a run-of-river, peaking, or storage mode.

## **Tidal Energy**

Tidal energy is from the ebb and flow of the tide. Typically located on the coast, as the tide rises, water is allowed to flow through gates in a dam to fill a basin behind it. At high tide the gates are closed and as the tide falls the water in the basin is retained behind the dam. Once sufficient water has built up, the water behind the dam is released and the potential energy it possesses is converted into kinetic energy which is captured by a turbine to drive generators to produce electricity.

## **Wave Energy**

Ocean waves are a derived form of solar energy, with the unequal solar heating of the earth generating wind, and wind blowing over water generating waves. There are a variety of wave energy systems under development, ranging from small-scale shoreline to large scale off-shore systems. The wave energy systems at the shoreline typically are oscillating water column devices while off-shore the devices are floating and held in place by different types of moorings.

---

From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
Copies to: "Razzaboni, James" <James\_Razzaboni@nstaronline.com>, "Barsamian, Peter" <Peter\_Barsamian@nstaronline.com>  
Subject: Green Power  
Date sent: Fri, 27 Jun 2003 15:49:21 -0500

Gary,

We're meeting with the person conducting the focus groups next Wed at 2:00 in SW3F (you're welcome to attend if you'd like). We'll need the pricing information that we spoke about in the last meeting. Could you please fill it out on the attached and send back to me. Please also review what I've written so far and send me any comments.

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
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SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00008

# Green Power Option

## Product Description

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25%  
50%  
100%

Dark Green  
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50%  
100%

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---

From: Energy Info Source <eismail@energyinfosource.com>  
To: Subject: International Green Power Report  
Date sent: Wed, 25 Jun 2003 10:54:01 -0500

Energy Info Source is privileged to offer its International Green Power Report, a comprehensive 250-page study of the International green power market - focusing on the US, Canada, Europe, and Australia.

The report takes a wide-ranging look at the past, present, and future state of green power, and both individually and collectively addresses the technologies of Biopower, Geothermal, Ocean Power, Photovoltaics, Concentrating Solar, and Wind.

[http://www.energyinfosource.com/products/product.cfm?report\\_ID=16](http://www.energyinfosource.com/products/product.cfm?report_ID=16)

Topics covered in the report include:

- The Key Technologies Being Used or Planned for Green Power
- The Economics of Green Power and its Market Potential
- Barriers to implementing Green Power
- Historical and Current Use of Green Power on a National Basis
- Government Policies and Incentives in Support of Green Power
- Definition of What Green Pricing Is and How it Works
- Overview of International Green Pricing Programs
- Definition of What Green Tags Are and How They Work

Energy Info Source's International Green Power Report includes over 90 charts, tables, and schematics that provide a wealth of cost, market, and technical information on utility-scale green power.

The report comes in Adobe Acrobat PDF format and is available via email, CD-ROM or Hardcopy for \$599.

To order click on the following link or call us at 888-986-2250 (303-986-7449 overseas or in Canada). We accept Visa/Mastercard/American Express.

[http://www.energyinfosource.com/products/product.cfm?report\\_ID=16](http://www.energyinfosource.com/products/product.cfm?report_ID=16)

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If you want to be removed from our mailing list or for more information:

Energy Info Source, Inc.

email: [eismail@energyinfosource.com](mailto:eismail@energyinfosource.com)

phone: 888-986-2250

address: 575 Union Blvd. Suite 107, Lakewood CO 80228

Please make sure you are familiar with the NSTAR Information Systems Acceptable Use Policy.

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From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Angley, Ellen" <Ellen\_Angley@nstaronline.com>, "Barsamian, Peter"  
<Peter\_Barsamian@nstaronline.com>, "Chiara, Stephen"  
<Stephen\_Chiara@nstaronline.com>, "Conner, Penelope"  
<Penelope\_Conner@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>, "Lyford, Richard"  
<Richard\_Lyford@nstaronline.com>, "Martin, Robert"  
<Robert\_Martin@nstaronline.com>, "Milton, John"  
<John\_Milton@nstaronline.com>, "Razzaboni, James"  
<James\_Razzaboni@nstaronline.com>, "Reed, Mark"  
<Mark\_Reed@nstaronline.com>, "Thompson, George"  
<George\_Thompson@nstaronline.com>  
Copies to: "'cummings@masstech.org'" <cummings@masstech.org>, 'Jason Gifford'  
<gifford@masstech.org>  
Subject: Discussion on Green Tags  
Date sent: Fri, 13 Jun 2003 14:28:36 -0500

Folks,

At our last meeting we decided to meet to specifically discuss Green Tags and it was thought we should meet sooner rather than later on this. I've asked the MTC to join us in this discussion and they are available 6/19 am or 6/20 am. everyone's schedules (in Outlook) are full. Is there any flexibility say early in the morning or over lunch?

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00012

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From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Anglely, Ellen" <Ellen\_Anglely@nstaronline.com>, "Barsamian, Peter"  
<Peter\_Barsamian@nstaronline.com>, "Conner, Penelope"  
<Penelope\_Conner@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>, "Lyford, Richard"  
<Richard\_Lyford@nstaronline.com>, "Martin, Robert"  
<Robert\_Martin@nstaronline.com>, "Milton, John"  
<John\_Milton@nstaronline.com>, "Razzaboni, James"  
<James\_Razzaboni@nstaronline.com>, "Reed, Mark"  
<Mark\_Reed@nstaronline.com>, "Thompson, George"  
<George\_Thompson@nstaronline.com>  
Subject: Meeting Materials  
Date sent: Mon, 9 Jun 2003 09:56:11 -0500

Folks,

Attached are the meeting materials for tomorrow. As a reminder our meeting is Tuesday 3:00 PM in SW3F

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00013

# Green Power Product Development

## *Bi-Weekly Status Report*

**Report Date:** 06/6/03

**Report Period:** Through 06/6/03

**Overall Status:** **On Track for proposed 10/01/03 DTE filing.**  
**Next Meeting Tuesday June 10, 3:00 PM SW3F**

### **Recent Activity:**

#### ***Accomplishments:***

- Received 29 surveys from CSG
- Received 28 surveys from NSTAR Call Center
- Surveys have been evaluated and summarized
- Received preliminary proposal from Green Mountain Energy
- Received proposal for customer focus groups

#### **Plan for time period (6/9/03 to 6/23/03):**

- Investigate billing options
- Pursue Customer Focus Group
- Contact Green Mountain Energy reference in Oregon (if applicable)
- Begin RFP for Green Product marketing assistance

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## **Agenda**

- Survey
- Preliminary Product Description
- Billing
- Marketing
- Next Steps

# **Green Power Survey Results**

## **Results**

- 60% are interested in a Premium Green Power product
- 34% would prefer to choose their own mix while 46% would prefer that NSTAR choose the most cost effective mix
- 70% of customers prefer wind or solar
- 70% want to know where the power is and that it be local
- 34% prefer to purchase from NSTAR versus 17% who would prefer an independent supplier
- 11% would still consider purchasing Green Power if it could only be billed on a credit card. 86% prefer it on the electric bill.
- 20% prefer a fixed dollar amount compared to 43% who would prefer a percentage of use
- Green Tags still seem confusing since the results are completely varying
- 67% Feel this will improve NSTAR's image

## **Conclusion**

- Customers want the option of Premium Green Power
- Customers want to purchase Green Power from NSTAR
- Offering Green Power will improve NSTAR's image
- Preferred product should include the following attributes –
  - High percentage of familiar (to the customer) technologies such as wind & solar
  - Local, visible generating plant(s). An individual plant could be used as a marketing tool to meet this goal.
  - Offered as a percentage of electrical usage
  - Billed on the NSTAR electric bill
  - Green Energy is preferred over Green Tags

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From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Conner, Penelope" <Penelope\_Conner@nstaronline.com>, "Anglely, Ellen"  
<Ellen\_Anglely@nstaronline.com>, "Barsamian, Peter"  
<Peter\_Barsamian@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>, "Lyford, Richard"  
<Richard\_Lyford@nstaronline.com>, "Martin, Robert"  
<Robert\_Martin@nstaronline.com>, "Milton, John"  
<John\_Milton@nstaronline.com>, "Razzaboni, James"  
<James\_Razzaboni@nstaronline.com>, "Reed, Mark"  
<Mark\_Reed@nstaronline.com>  
Subject: Green Power Status  
Date sent: Wed, 14 May 2003 08:51:49 -0500

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00017

# Green Power Product Development

## *Bi-Weekly Status Report*

**Report Date:** 05/13/03

**Report Period:** Through 05/11/03

**Overall Status:** On Track for proposed 10/01/03 DTE filing.

**The Green Power Team consists of –**

**Penni Connor**

**Peter Barsamian**

**Frank Gundal**

**Jim Razzaboni**

**Ellen Anglely**

**Gary Cunningham**

**Bob Martin**

**Richard Lyford**

**John Milton**

**We will hold monthly status meeting starting first week in June.**

**Bi-Weekly status reporting will be implemented**

### **Recent Activity:**

#### ***Accomplishments:***

- Delivered and trained Call Center personnel on survey
- Delivered survey to CSG to conduct during Energy Efficiency home energy audits
- Met with CSG to discuss products/options
- Met with Green Mountain Energy to discuss products/options
- Received preliminary proposal from Fleet for credit card billing

#### **Plan for time period (5/19/03 to 5/30/03):**

- Collect surveys and develop report
- Investigate costs/scope to conduct customer focus groups
- Solicit Green Mountain Energy for a concept proposal to develop, brand and market a green product
- Contact Green Mountain Energy reference in Oregon

00018

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From: "Anglely, Ellen" <Ellen\_Anglely@nstaronline.com>  
To: "Reed, Mark" <Mark\_Reed@nstaronline.com>, "Conner, Penelope"  
<Penelope\_Conner@nstaronline.com>  
Copies to: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>, "Barsamian, Peter"  
<Peter\_Barsamian@nstaronline.com>, "Martin, Robert"  
<Robert\_Martin@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>  
Subject: RE: Green power  
Date sent: Tue, 13 May 2003 10:34:55 -0500

We don't have one yet, there is a group working on the design that is in the process of doing a customer survey. Penni's folks are taking the lead. Last week I asked her to have them put together status reports so Doug and I could be up to speed on their progress. It would make sense to include you so that we can all be saying the same thing.

-----Original Message-----

**From:** Reed, Mark  
**Sent:** Tuesday, May 13, 2003 8:52 AM  
**To:** Anglely, Ellen  
**Subject:** Green power

I need a tutorial on our proposal. Direct me to whomever, thanks.

00019

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From: "Spinosa, Carol" <Carol\_Spinosa@nstaronline.com>  
To: "Anglely, Ellen" <Ellen\_Anglely@nstaronline.com>, "Barsamian, Peter" <Peter\_Barsamian@nstaronline.com>, "Conner, Penelope" <Penelope\_Conner@nstaronline.com>, "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>, "Gundal, Frank" <Frank\_Gundal@nstaronline.com>, "Martin, Robert" <Robert\_Martin@nstaronline.com>  
Subject: FW: EEI E-Forum Lessons Learn on Green Pricing Tariffs  
Date sent: Tue, 13 May 2003 07:49:40 -0500

FYI -

Carol  
on behalf of Ellen Anglely  
-----Original Message-----

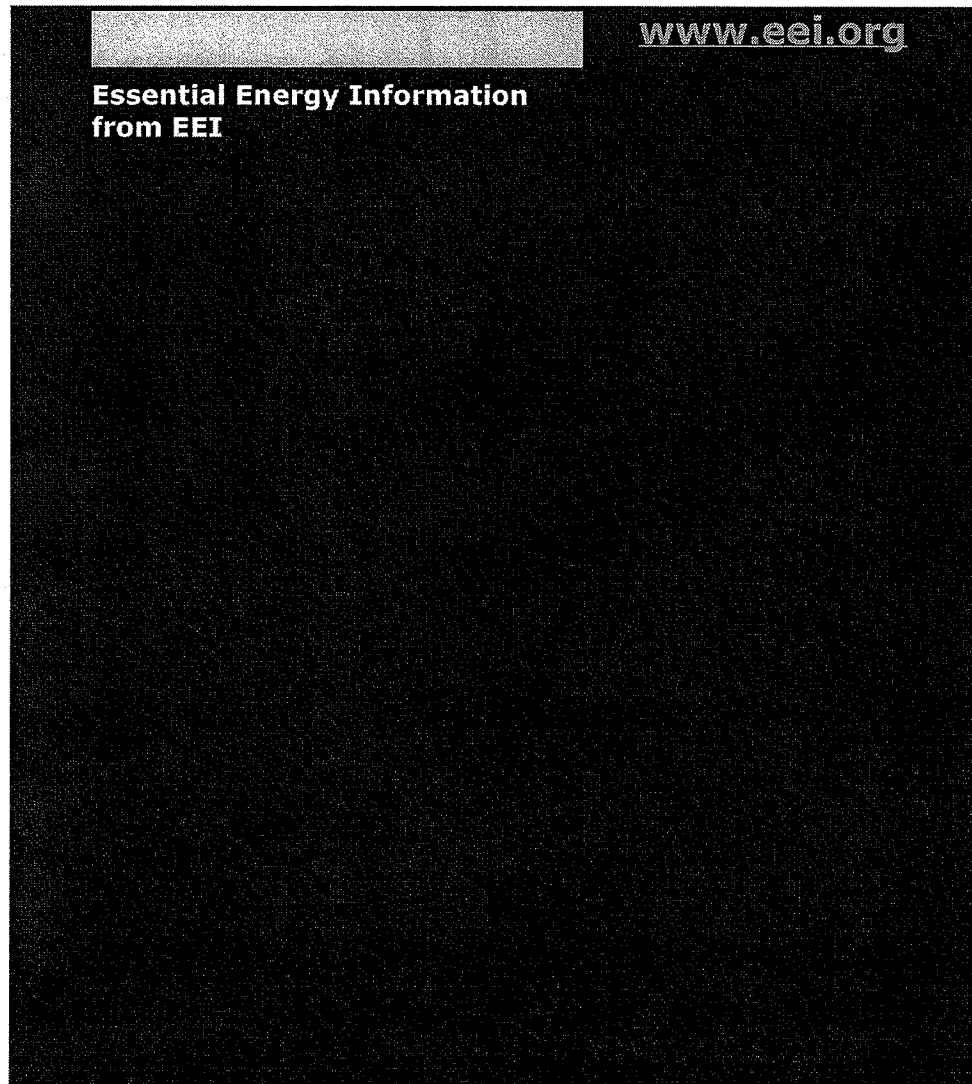
**From:** Anglely, Ellen  
**Sent:** Monday, May 12, 2003 5:42 PM  
**To:** Spinosa, Carol  
**Subject:** FW: EEI E-Forum Lessons Learn on Green Pricing Tariffs

Carol,

Please forward to the green team. Also sign me up.

-----Original Message-----

**From:** Michael Oldak [mailto:MOldak@eei.org]  
**Sent:** Monday, May 12, 2003 2:58 PM  
**Subject:** EEI E-Forum Lessons Learn on Green Pricing Tariffs



## **Green Pricing E-Forum**

**Monday, June 9, 2003**

**2:00 - 4:00 PM EDT**

(You will need your EEI Member Net ID and password to access information about this meeting. If you do not know your company's ID and password, please send a request to [members@eei.org](mailto:members@eei.org).)

Five utilities present the basics of their green tariffs then answer questions related to the development of the tariffs and programs.

Utilities presenting are:

0. Aquila Networks
1. Arizona Public Service
2. Idaho Power Company
3. We Energies
4. Xcel Energy

Topics covered in Q&A include an exploration into the price of green energy sources, challenges in negotiating green tariffs with regulatory bodies, ways renewable energy advocacy groups can help a green program, marketing green tariffs and programs, and more.

Please plan to join us for this overview of green tariffs.

### **SITE REGISTRATION FEE: \$100.00**

***Multiple participants are welcome to share a single phone line and Internet connection at no additional charge*** (e.g., in a conference room or auditorium).

### **ONLINE REGISTRATION**

To register online, please go to:

[http://www.eei.org/member\\_net/meetings/m030609/](http://www.eei.org/member_net/meetings/m030609/)

### **REGISTRATION CUT-OFF AND CANCELLATIONS**

All registrations must be received by June 6, 2003. No refunds will be made for cancellations received after that date. However, substitutions may be made at any time.

### **WHAT IS AN E-FORUM?**

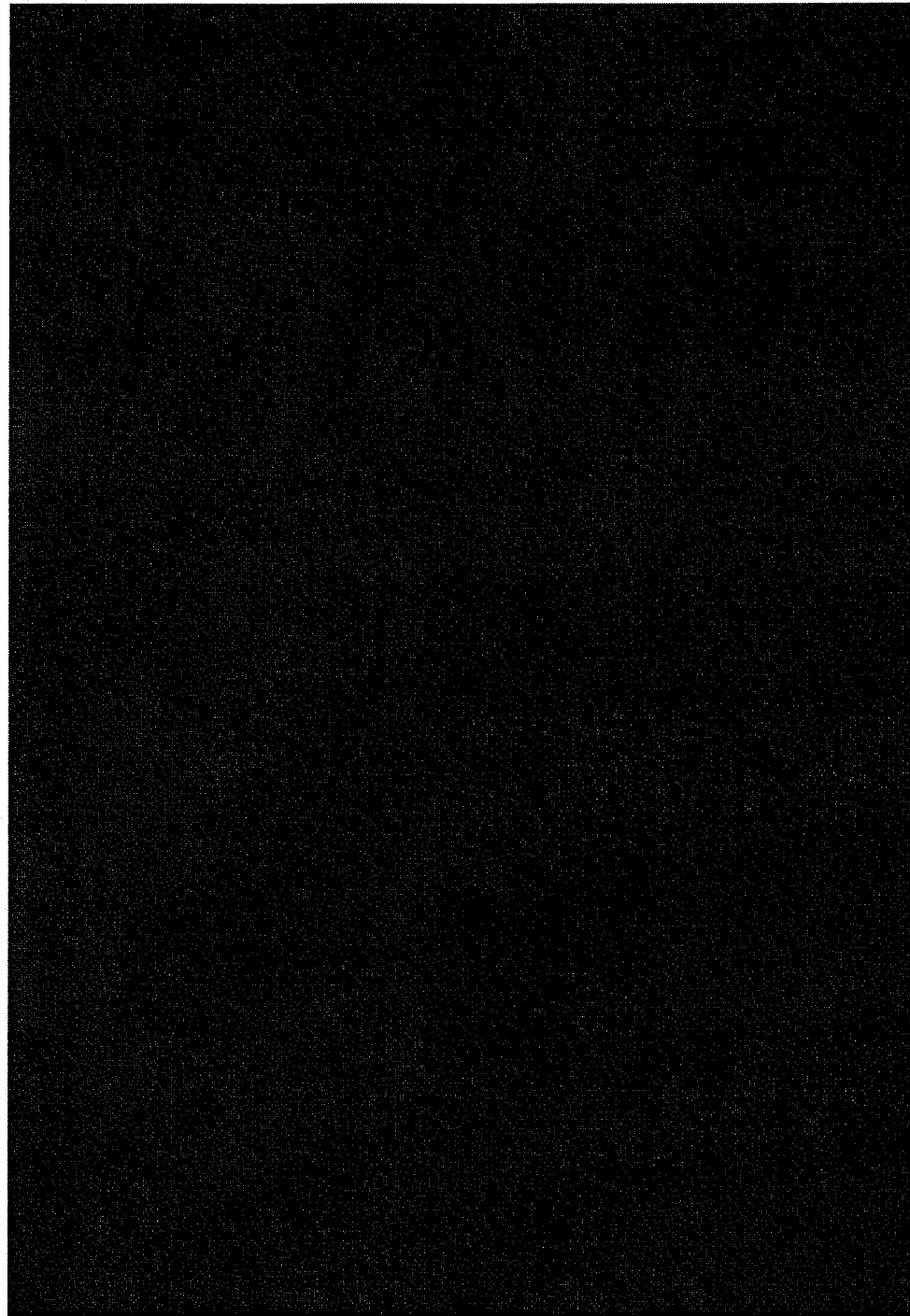
E-Forums are real-time, interactive presentations, created, produced and distributed by EEI. The visual presentation uses slides delivered over the Internet, while the audio portion is delivered through a conference phone call. You can participate in an E-Forum using any computer with Internet access and a telephone. Approximately 24 hours prior to the E-Forum, registrants will be emailed complete instructions, including the web address (URL), with password and ID, and the conference phone number.

### **QUESTIONS?**

For administrative/registration questions and assistance, please contact Leigh Miller at (202) 508-5522 or [lmiller@eei.org](mailto:lmiller@eei.org).

For more information on seminar content, please contact Cass Bielski at (202) 508-5672 or [cbielski@eei.org](mailto:cbielski@eei.org).

00021



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You are currently subscribed to gp\_forum as: moldak@eei.org.  
To unsubscribe send a blank email to leave-gp\_forum-319812O@ls.eei.org

Please make sure you are familiar with the NSTAR Electronic  
Communications System Policy.

00022

## Unknown

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**Full Name:** Oldak Office  
**Last Name:** Oldak  
**First Name:** Michael  
**Department:** FR&PSP

**Business:** 5523

**E-mail:** MOldak@eei.org  
**E-mail Display As:** Oldak Office (MOldak@eei.org)

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From: Energy Info Source <eismail@energyinfosource.com>  
To: Subject: Green Power Insight newsletter  
Date sent: Fri, 18 Apr 2003 10:41:39 -0500

As a user of Energy Info Source, we are privileged to make available to you a free sample issue of our renewable energy newsletter - Green Power Insight (click on the link below for sample).

<http://www.energyinfosource.com/products/samples/GPInsightApr03.pdf>

Green Power Insight provides analysis, commentary, and news on the hottest issues in renewable energy. Our coverage includes new technologies, green pricing and marketing, renewables legislation, interconnection standards, green power applications, and more.

Green Power Insight is the industry's only renewable energy-focused newsletter that doesn't just present the news, but identifies the key trends and issues, analyzes them, and tells you what they mean. In addition, we don't just present the "rose-colored glasses" view of green power that many others do, but instead take a look at the issues that are holding green power back from the market. We talk to the folks developing and implementing green power initiatives to get an inside view of what's going on in the industry.

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phone: 888-986-2250  
address: 575 union blvd. #107, lakewood co 80228

Please make sure you are familiar with the NSTAR Electronic Communications System Policy.

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From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Razzaboni, James" <James\_Razzaboni@nstaronline.com>,  
"Barsamian, Peter" <Peter\_Barsamian@nstaronline.com>, "Chiara, Stephen"  
<Stephen\_Chiara@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>, "Martin, Robert"  
<Robert\_Martin@nstaronline.com>, "Armstrong, James"  
<James\_Armstrong@nstaronline.com>  
Copies to: "Anglely, Ellen" <Ellen\_Anglely@nstaronline.com>  
Subject: RE: Green Power  
Date sent: Mon, 24 Mar 2003 11:19:52 -0500

Folks,

If we're all in agreement, let's meet Friday 1:30 SW3E.

Thanks,  
FG

-----Original Message-----

**From:** Gundal, Frank  
**Sent:** Monday, March 24, 2003 10:47 AM  
**To:** Razzaboni, James; Barsamian, Peter; Chiara, Stephen; Cunningham, Gary; Martin, Robert;  
Armstrong, James  
**Subject:** Green Power

Folks,

Can we get together again next Friday afternoon to further pursue this subject? Please see attached update. If anyone has any additions/comments please send them to me and I will update.

Sincerely,  
Frank Gundal  
Sr. Engineer

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NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

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From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Razzaboni, James" <James\_Razzaboni@nstaronline.com>, "Barsamian, Peter" <Peter\_Barsamian@nstaronline.com>, "Chiara, Stephen" <Stephen\_Chiara@nstaronline.com>, "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>, "Martin, Robert" <Robert\_Martin@nstaronline.com>, "Armstrong, James" <James\_Armstrong@nstaronline.com>  
Subject: Green Power  
Date sent: Mon, 24 Mar 2003 10:46:32 -0500

Folks,

Can we get together again next Friday afternoon to further pursue this subject? Please see attached update. If anyone has any additions/comments please send them to me and I will update.

Sincerely,  
Frank Gundal  
Sr. Engineer

-----  
NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

## **Green Power**

Update –

### **NSTAR Owned Renewable**

Jim Armstrong confirmed that we are paying into the renewable fund to in theory NSTAR is eligible for funding for a project at the Summit.

- Will there be a backlash on NSTAR getting this funding?
- There will still be substantial costs, would NSTAR want to fund it?

### **NGRID Program**

I attended an NGRID committee meeting. In attendance were - NGRID legal & regulatory, DTE, DOER, MTC, Mass Energy, Green Mountain Power and another energy supplier.

They are offering a hybrid program for both SO and DS customers. Customers interested will contact an alternative green supplier. NGRID will accept Green Tags from the supplier and match it to the actual load thus re-creating a bundled product. The main issue that they wrestled with was how to reconcile the Green Tags to the load. Should it be month to month? Rolling 12-month average? Etc. What about the prospectus label versus the verified label? A lot of this went over my head.

They are following the guidelines of GreenE.

### **NSTAR DS/SO RFP Option**

I spoke with Steve Chiara and then with Bob Martin. Steve indicated we may be able to do the same work around as we are doing with SMD. It would work like this...

We create an additional T&D rate. For example residential rate A1 for green would be A11. The T&D rates would remain the same. The default service rate would be increased by the green component. The entire revenue for the generation would still go into the default account. At the end of the quarter, 1/2 year or whenever Bob Martin creates a report which shows how much kwh and \$'s were pulled in for the A11. From this we can get the exact green amount.

Bob Martin said we could add a clause into the RFP with verbiage such as "Please supply a price for green power above and beyond the 1% requirement. This price is an optional price to be trued up at the end of the contract based upon customer participation". We can expand on this or make whatever other requirements we want.

Bob also indicated that he has an RFP going out in 2 weeks. We could add this verbiage at that time to test the market. We can describe our program and expected roll-out etc so we are up front with them.

**Block Type Purchase**

There still does not seem to be any easy way to get a block type sale on the electric bill. I am working with Fleet bank to get a rough idea on pricing if we take the credit card route.

**To Be Discussed**

- General discussion on items listed above
- Start assembling outside team members similar to NGRID?
- Further brainstorming?

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From: "Martin, Robert" <Robert\_Martin@nstaronline.com>  
To: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
Subject: FW: Proposed Verbiage for Default Service RFP  
Date sent: Fri, 21 Mar 2003 10:00:06 -0500

Take a look at this  
-----Original Message-----

**From:** Gundal, Frank  
**Sent:** Thursday, March 20, 2003 11:56 AM  
**To:** Martin, Robert  
**Cc:** Barsamian, Peter  
**Subject:** Proposed Verbiage for Default Service RFP

Bob,

Just a first swipe. Can you translate into proper RFP language and shoot back to us?

FG

00029

## Proposed Verbiage for Default Service RFP

### Summary

NSTAR is in the process of developing a green product offering for its default service and standard offer customers. This offering will be over and above the 1% requirement previously described in this RFP.

Based upon other utilities market penetration we expect 1% of our customers to sign up for this offering which would correspond to ??? kWh of Green Power.

Currently our goal is to roll this product offering out on 10/1/03.

### Request for Proposal

Please supply NSTAR with a premium (additional cost above quoted price within this RFP) cost per kwh for Green Power. The amount will be actual usage based upon customer subscription. Green Power will be per the Mass Renewable definition. Must be GIS certifiable.

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From: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
To: "Barsamian, Peter" <Peter\_Barsamian@nstaronline.com>, "Martin, Robert"  
<Robert\_Martin@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>, "Razzaboni, James"  
<James\_Razzaboni@nstaronline.com>  
Subject: Date sent: Wed, 19 Mar 2003 13:34:28 -0500

**January 2003-Green Mountain Energy Company** announced that it is discontinuing operations in Connecticut's retail electricity market because of "regulations that make it cost prohibitive to bring pollution-free energy" into the state "as well as the overall lack of a competitive electric market." Specifically, the company maintains that the standard offer rate available to retail customers is too low and "does not reflect the true cost of electricity" and that new rules adopted by the New England grid system operator "place limitations and excessive costs" on the company's ability to secure wind energy for Connecticut customers.

Green Mountain currently serves 1,312 customers in the state, who will be returned to their default electricity suppliers. The company said that it will focus its East Coast efforts on expanding its customer base in New Jersey, New York and Pennsylvania.

**News Release - Green Mountain Energy Company Pulls Plug in Connecticut**

***They don't list Mass on their availability either.***

Sincerely,  
Frank Gundal  
Sr. Engineer

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NSTAR  
One Nstar Way  
Westwood, MA 02090  
SUM-SW340  
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Fax 781-441-3191

00031

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From: "Gundal, Frank" <[Frank\\_Gundal@nstaronline.com](mailto:Frank_Gundal@nstaronline.com)>  
To: "Cunningham, Gary" <[Gary\\_Cunningham@nstaronline.com](mailto:Gary_Cunningham@nstaronline.com)>  
**Subject: FW: Green Power - NSTAR**  
Date sent: Wed, 19 Mar 2003 08:57:12 -0500

00032

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From: "Anglely, Ellen" <Ellen\_Anglely@nstaronline.com>  
To: "Martin, Robert" <Robert\_Martin@nstaronline.com>, "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
Subject: FW: Mass Energy on Green Pricing  
Date sent: Tue, 18 Feb 2003 11:34:45 -0500

fyi

-----Original Message-----

From: Larry Chretien [<mailto:larry@massenergy.com>]  
Sent: Tuesday, February 18, 2003 11:20 AM  
To: ellen\_anglely@nstaronline.com; penelope\_conner@nstaronline.com  
Cc: douglas\_horan@nstaronline.com  
Subject: Mass Energy on Green Pricing

Hello Ellen and Penelope,

I'm writing to follow up my phone call with Ellen. When we heard of National Grid's intentions, I forwarded NG's presentation to Doug Horan as well as a memo indicating Mass Energy's position on a few issues. Please take a look at what I wrote to Doug below and in the memo. We would greatly appreciate the opportunity to discuss this with you in person at your earliest convenience. Ellen indicated that NSTAR's point person would be Penny.

Mass Energy has been developing a green power program for over a year with funding from MTC and the John Merck Fund and in partnership with several environmental and community groups. We very much want to offer NSTAR customers the best possible green power offering as soon as possible.

Thanks very much.

Larry

Larry Chretien  
Executive Director  
Mass.Energy Consumers Alliance (Mass Energy)  
- now celebrating our 20th anniversary  
670 Centre Street, Boston, MA 02130  
617-524-3950 (fax 617-524-0776)  
[www.massenergy.com](http://www.massenergy.com) and [www.solarboston.org](http://www.solarboston.org)

-----Original Message-----

From: Larry Chretien [<mailto:larry@massenergy.com>]  
Sent: Friday, January 31, 2003 4:57 PM  
To: douglas\_horan@nstaronline.com  
Subject: Green Pricing

Hi Doug,

I'm quite interested in your reaction to Tom Robinson's presentation. We have prepared a memo in response to his presentation. Please see the attached. I hope to hear from you.

Larry

-----Original Message-----

From: Larry Chretien [<mailto:larry@massenergy.com>]  
Sent: Friday, January 24, 2003 4:56 PM  
To: Douglas\_Horan@nstaronline.com  
Subject: Green Pricing

Hi Doug,

00033

Here's the proposal from National Grid. As I said, Mass Energy was just about to become a licensed retailer for green power. We were going to work with a wholesaler to offer a delivered product. Our business plan included working with a number of affinity marketing groups, many of which are based in NSTAR territory. Now that MTC is supporting green pricing, we will work to become one of the suppliers to National Grid's customers. So we would obviously like to offer a green pricing-based, or certificate-based product to NSTAR customers.

I should add that National Grid is throwing out the idea of offering this to their standard offer customers, I think because DTE has the default service proceeding going. But there is a lot of talk in favor of offering green pricing to SO and DS customers. And that's what we would strongly prefer.

I'm interested in your thoughts. Have a good weekend.

Larry Chretien  
Executive Director  
Mass.Energy Consumers Alliance (Mass Energy)  
- now celebrating our 20th anniversary  
670 Centre Street, Boston, MA 02130  
617-524-3950 (fax 617-524-0776)  
[www.massenergy.com](http://www.massenergy.com) and [www.solarboston.org](http://www.solarboston.org)

Please make sure you are familiar with the NSTAR Electronic Communications System Policy.

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# MASSACHUSETTS RENEWABLE CERTIFICATE PROGRAM

BY MASSACHUSETTS  
ELECTRIC COMPANY

JANUARY 16, 2003



# OBJECTIVES

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- Stimulate the Market for Renewable Energy
- Support RPS Program
- Introduce Choices for Customers
- Exploit Tax Advantages Created by MTC

# BUILDS ON NEW YORK PROGRAM

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- Niagara Mohawk Developed Renewable Program as Part of Merger Settlement
- Launched in August, 2002
- Renewable Attribute Shown Separately on Niagara Mohawk Bill
- Three Renewable Marketers
- 5000 Renewable Customers



# MASSACHUSETTS CERTIFICATE PROGRAM

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- Step 1—Supplier Contracts with Customer
- Step 2—Mass. Electric Bills Customer
- Step 3—Mass. Electric Reports to Supplier and MTC on Quantities Sold
- Step 4—Supplier Purchases RPS Certificates and Transfers to MTC for Retirement
- Step 5—MTC Retires Certificates; Customer Is Eligible for Tax Deduction for Renewable Payment

# DETAILS UNDER DISCUSSION

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- Scope of Certificates
  - New (RPS) or Existing Facilities
  - New England or Broader Region
  - Sales of Renewable Electricity
- Standard Offer, Default Service
- Details of Contracts and Terms
- Supplier Eligibility
- Mass. Electric Marketing and Education Support
- Environmental Disclosure
- NEGIS Coordination
- Information Systems, Tax Reporting, and Pro Rata Payment
- Recovery of Administrative Costs



## Memo

To: Distribution List, see page 8.  
From: Massachusetts Energy Consumers Alliance  
Date: 1/31/03  
Re: Mass Energy Reaction to National Grid's Green Pricing Proposal

As an organizations eager to encourage both the supply and demand for renewable energy in Massachusetts, we are writing to offer comments on the proposal by National Grid to establish a green pricing program. We believe that green pricing has great potential for stimulating demand for renewable energy. However, the details of any program design are critical. We submit this letter to offer our strong support for the development of statewide green pricing programs, and to provide specific recommendations regarding how such programs should be designed.

### **Background on Green Electricity Efforts of Mass Energy and Partners**

The Massachusetts Energy Consumers Alliance (Mass Energy) is a non-profit organization dedicated to energy affordability and environmental sustainability. For several years, Mass Energy has educated consumers about the benefits of renewable energy and energy conservation, and has sold a renewable energy "tag product" called ReGen. However, while consumers tell us that they are excited about the prospect of purchasing "green electricity," we have found that the tag product approach, which involves selling green electricity separately from the normal monthly electric bill, is both confusing and unappealing to consumers. Since we believe that public appeal and consumer confidence are essential ingredients to build a successful green electricity market, we have been eager to pursue alternatives to the "tag product" approach.

Given that Massachusetts' electric industry has been restructured to allow consumers to switch their supplier, a green supply option offered by a licensed retail supplier seems a far superior option to a tag product. With funding from MTC and the John Merck Fund, Mass Energy has spent over a year and a half researching the feasibility of offering this type of product (often referred to as a "delivered" product) to consumers, working in partnership with the following environmental organizations and municipal bodies: Boston Public Health Commission, Town of Brookline, City of Cambridge, City of Newton, Clean Water Action, Coalition on Environment and Jewish Life (COEJL), Environmental League of Massachusetts (ELM), Green Decade Coalition/Newton, Massachusetts Climate Action Network, Massachusetts Audubon Society,

Massachusetts Public Interest Research Group, New Ecology, Inc., Sierra Club of Massachusetts, Somerville Climate Action Network, and Tufts Climate Initiative.

Our initial intention was to aggregate consumer demand and partner with a licensed retail supplier that would supply a green product. However, we were unable to identify a retailer willing to serve our needs. Therefore, we pursued a hybrid model in which we would partner with a wholesale supplier, but would handle all renewable energy procurement and customer service functions ourselves. We were well on our way toward launching a product this spring when we learned of National Grid's efforts to develop a green pricing program.

We are excited about the potential of utility green pricing programs, as we believe that such programs can help overcome near-term barriers and jump-start green power market activity. By allowing consumers to purchase green electricity from competitive green electricity marketers via their normal monthly electricity bill and reducing the energy procurement risks and challenges faced by green electricity marketers, green pricing has the potential to be a favorable alternative to both the "delivered" and "tag" product scenarios. We submit the following comments and suggestions to DTE, MTC, DOER, National Grid, key legislators and others in an effort to guide the development of a green electricity market that will best serve Massachusetts consumers and will succeed in driving the development of new renewable energy projects.

### **Broad Green Pricing Recommendations**

#### ***1) All Residential and Small Commercial Consumers in Massachusetts Should Have Access to Green Pricing Programs.***

We believe that a green pricing program in National Grid's territory would so substantially limit the potential volume of customers available to competitive suppliers that we are unlikely to see any delivered products offered while the National Grid program is in effect. Therefore, we urge DTE, DOER and MTC to work together to bring green pricing programs to all utility territories in Massachusetts. This would provide all Massachusetts consumers with the benefits of simple access to green electricity purchasing options, reducing consumer confusion and increasing the ability for renewable energy purchasing behavior to really take hold across the state.

We also believe that green pricing programs should allow participation by both standard offer and default service customers. While the existence of the standard offer rate has played a key role in triggering the introduction of green pricing in Massachusetts, most consumers are unaware of the difference between standard offer and default service. Limiting green pricing to just standard offer customers would cause significant confusion among consumers and would serve no other useful purpose. As noted above, the presence of a National Grid green pricing program, even if applied to standard offer customers only, would likely limit the entry of competitive supply offerings. Therefore, default service customers would probably not have green electricity purchasing alternatives if such programs were not made available to them.

#### ***2) Leadership by DTE, DOER and MTC is Essential.***

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While National Grid should be commended for taking a leadership role by initiating green pricing planning in its territory, it is important to recognize that green pricing in such a large utility territory will affect the green power market statewide. Therefore, we urge DTE, DOER and MTC to embrace this development as an opportunity to introduce strong and effective green pricing programs across the state. Furthermore, we urge DTE to codify any commitments made by distribution companies so that, in the case of changing corporate priorities, the distribution company would not suddenly end its commitment to green pricing. Furthermore, because the presence of green pricing will have such a profound effect on the green power market, the rules of the game should be made clear, transparent, and publicly accountable.

***3) Billing Access and Collection Services Should be the Design Drivers for Green Pricing Programs.***

We believe that the two greatest values offered by green pricing programs are: 1) access to the standard electricity bill; and 2) collection and distribution of customer payments by distribution companies. Having exhaustively studied green pricing program models from across the country, we believe that programs with these two elements at their core have the greatest potential to stimulate a meaningful and robust green electricity market. In markets where delivered supply products are slow to emerge, the ability for consumers to purchase green electricity certificate or "tag" based products as part of their normal monthly billing process is key to the success of green electricity product sales.

While the affiliation with the utility company and any related utility marketing initiatives may certainly help boost the success of green pricing programs, we believe that, on issues where there are tradeoffs to be made, we should look to the basic goals of billing access and collection services as the core functional goals of any program design.

***4) MTC Must Use Green Pricing as an Opportunity to Educate Consumers about Benefits of Renewable Energy and the Importance of their Participation.***

After years of pondering the chicken and egg dilemma of whether renewable energy education was needed to drive energy choices, or whether education should only happen once energy choices were available, green pricing finally presents us with an opportunity to coordinate the introduction of both at the same time. While green pricing certainly lowers the barriers to entry for green electricity marketers, they will still face great marketing costs if they are starting from scratch on educating consumers about why their products matter. In order to enable green marketers to focus on getting the best products out to consumers rather than raising general consumer awareness about renewables, MTC should invest in a robust educational campaign.

While we believe it is appropriate to engage participating distribution companies in the delivery of an educational campaign, we do not believe the distribution companies should project an image of ownership over the green electricity options made available to consumers. For example, we suggest that green pricing be described as, "A variety of renewable energy companies are offering consumers the ability to 'green' their energy supply by making purchases on their National Grid bill," rather than, "National Grid is offering its customers a variety of options to purchase renewable energy."

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***5) Simplify Details, Make Use of Existing Infrastructure Where Possible, and Move Swiftly through Program Design.***

Given the potentially short life of green pricing in the state, it is important to expedite program development in order to maximize the potential impact of the programs, and so that participating companies will find value in their investments. Therefore, we urge program designers to take advantage of existing infrastructure where possible and where appropriate. While green pricing is somewhat of a hybrid mixture of a delivered product and a "tag" product, it is important to look for opportunities to adapt and borrow from what already exists rather than creating new infrastructure. Examples are provided in the suggestions below.

We urge program designers to expedite the development of green pricing programs statewide, and to arrange for the launch of green pricing in National Grid's territory to occur no later than September 1, 2003.

***6) DOER Should Consider Using Green Marketers As Outlet for Marketing State Energy Efficiency Programs.***

Since green pricing marketers will gain recognition for their role as providers of environmentally-sustainable energy services, we believe DOER and utility program administrators should consider partnering with green marketers to market energy efficiency programs such as the Residential Conservation Service.

**Recommendations Regarding Supplier Standards and Participation**

***1) DTE Should Require Green Marketers to Obtain an Electricity Brokers License.***

Since green marketers' products would be sold via the DTE-regulated electricity bill, we believe it is important to protect consumers by screening green marketers through the Electricity Broker license application process. We are not aware of any Broker licensing requirements that could not reasonably be met by the green marketer applicant. We think this could be addressed by indicating on the application that the applicant is applying for purposes of participation in a green pricing program.

By using the Electricity Broker license instead of the Competitive Supplier license, as described in 220 CMR 11.05, it would be clear that green marketers are not subject to the same responsibilities as requirements as Competitive Suppliers (i.e. NEPOOL participation, load obligation, etc.).

Use of the Electricity Broker license is one example of an opportunity to use existing infrastructure to expedite the development and roll out of green pricing.

***2) Green Pricing Utility Should Develop Standard Program Application and Contract for Green Marketers, Subject to DTE Approval.***

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Standard application and contract processes would expedite the program launch process. We suggest that only one round of supplier selection take place between now and April 1, 2003, the outcome of which would be effective through the duration of the program. This will enable those that are selected to have a sufficient period of time to invest their organizations into this model. If, for some reason, a decision is made to continue the program beyond March, 2005, we suggest that another supplier selection process take place.

***3) No More than Five Product Options Should be Made Available to Consumers.***

In order to avoid overwhelming consumers with too many choices, and to keep the program to a manageable size, we believe that the range of product offerings should be limited to five per utility green pricing program for the purposes of ballot enrollment. These product choices could come from five different companies, or if fewer companies apply to participate in the program, there could be flexibility for some companies to offer more than one product.

If faced with a need to select among green marketers, DTE should be responsible for selection and should select those whose offerings seem to provide the best combination of quality and value to consumers. Each utility green pricing program should have its own separate selection process.

We suggest that program coordinators allow additional products that meet all program requirements to be billed via the electricity bill, though only the five selected products would be included on the quarterly enrollment ballot.

**Recommendations Regarding Product Standards**

***1) Products Should Only Include GIS Certificates.***

For the purposes of verifying product claims, and in order to keep the environmental benefits of Massachusetts green pricing as local as possible, we believe products should only include GIS certificates.

***2) Products Should Match at Least Twenty-five Percent of Total Customer Usage, With at Least Twenty-five Percent of Customer Usage Being Supplied by New Renewables.***

We believe that a twenty-five percent minimum quantity of usage will ensure that participating consumers will receive a meaningful amount of renewable energy while enabling green marketers some product flexibility. Furthermore, this minimum new renewable requirement would guarantee that green pricing programs to have play a significant role in increasing the development of new renewable resources in the region.

Furthermore, we believe that the minimum twenty-five percent of usage requirement for new renewables will provide an appropriate level of consistent quality across all products, while taking into account the current scarcity of new renewables in the region.

00044

### ***3) All Products Should Be Green-e Certified***

In order to ensure the high quality of all resources being offered through green pricing programs, we recommend that the Green-e standard for blended products be used as the benchmark for products. The Green-e standard has been developed through a thorough and exhaustive nationwide stakeholder process and is widely recognized as a solid product standard. By bringing Green-e into the green pricing market in Massachusetts, we will leverage the experience and quality control mechanisms offered by the certification body. We recommend that Green-e's blended product standard be applied to green pricing products.

### ***4) New Renewable Content of Products Should Increase by Five Percent Per Year.***

While Green-e standards do address new renewable content, we believe that Massachusetts green pricing program rules should go even further. As suggested above, all products should start at twenty-five percent new renewables, and we suggest that this new renewable content increase by five percent per year.

## **Recommendations Regarding Program Mechanics**

### ***1) Product Claims Based on Rolling Twelve-Month Average of Certificate Holdings.***

Given the intermittent nature of key renewable resources such as wind, solar and hydro, as well as the current regional scarcity of desirable resources such as new wind projects, we urge program designers to grant green marketers some flexibility in matching green certificates to customer's usage. In addition, such flexibility will provide green pricing suppliers with a greater ability to use customer demand to drive the development of new renewable energy projects.

The most straight-forward means by which to achieve an appropriate level of flexibility would be through the use of reserve GIS certificates. However, we recognize the importance of avoiding the use of reserve certificates due to the implications that a large volume of such certificates would have on the GIS system as a whole.

We suggest that the program designers work to develop a strategy that will provide green marketers with a sufficient level of annual flexibility while working within the standard procedures of the GIS system. If this cannot be done, we suggest that marketers use reserve certificates for verifying their product claims.

### ***2) Consumers Should Receive a Side-By-Side Comparison of Service With and Without Buying Renewable Energy Service.***

We believe that for the consumer to truly understand the impact of their participation as a green power buyer, they should receive two disclosure labels (or one label with a side by side comparison if DTE disclosure rules permit), one showing the mix of resources they would have received had they not chosen a green power offering, and one showing what their mix looks like

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as a result of choosing the green power offering. After all, if we are to present consumers with green alternatives, the purpose of disclosure should be to provide consumers with pertinent information on which to base their choices.

***3) Green Marketers Should be Responsible for Sending Tax Deductibility Receipt to Consumer.***

Since the renewable energy service would be provided by the green marketer, the green marketer must have the opportunity to communicate with the customer on the issue of tax-deductibility for that service. Since the distribution companies will be communicating with green marketers regarding customer usage information and payments, the suppliers will know how much their customers contributed. Furthermore, since the basis of the tax-deductibility may depend upon product content as much as quantity, the suppliers will be best suited to work with MTC to calculate the amount of each consumer's tax-deductible premium.

***4) Customer Enrollment Ballots Should be Distributed as a Quarterly Bill Insert Along With Disclosure Label, With Non-Ballot Enrollments Permitted As Well.***

While we recognize that it may be impractical to provide consumers with a monthly enrollment opportunity through the bill, it is important for enrollment to occur periodically, and with some frequency. It is widely accepted that consumers need to see several marketing messages before they purchase a product, and the ballot would certainly qualify as a strong marketing message. Furthermore, a quarterly enrollment opportunity would allow new residents to participate in the program.

Green marketers should be involved with the development of the ballot to ensure that it accurately reflects their product offerings. If, during the development of any scheduled ballot, green marketers come to a consensus decision that there are not enough new renewable resources available to accommodate the enrollment of more new customers, a quarterly enrollment insert could be skipped.

In addition to enrollments via the quarterly ballot, we believe that green marketers should be able to enroll new customers on their own as well. The enrollment process should recognize either a customer's written signature or on-line sign-up as sufficient authorization, with no three-day recession period being required. Since green marketers are not providing the same broad service that Competitive Suppliers provide to consumers, we believe it is necessary to hold them to the same enrollment requirements.

***5) Program Coordinators Should Use Simple Software to Facilitate Data Interchange With Green Marketers.***

We believe that the Electronic Data Interchange (EDI) process that is used for data interchange between distribution companies and Competitive Suppliers providing all requirements generation service is unnecessary for the purposes of a certificates-based green pricing program. Simple software, such as that used for fuel assistance programs in Massachusetts, could be used to exchange weekly data between utility program coordinators and green marketers. For eight

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years, Larry Chretien, Mass Energy's executive director, was the energy director for Quincy Community Action Programs, Inc. One of the programs he administered was fuel assistance, which is a program now serving about 140,000 households in Massachusetts. His experience there suggests that the information systems used to manage that program are quite applicable to this particular case.

The twenty-two agencies administering fuel assistance exchange data electronically with the state's electric and gas utilities for two important purposes. The first is to provide electric heat (and sometimes cooling) customers with a fuel assistance subsidy based upon their fuel assistance eligibility and their monthly consumption. The second is to provide ALL customers with the low-income discount electricity rate and to apply that rate on a monthly basis to the customer's consumption.

We hope that green pricing programs will grow to serve more customers than are currently served by fuel assistance programs, but even if customer enrollment were to exceed 140,000, we believe that the software used to manage the fuel assistance programs is clearly sufficient for the purposes of green pricing. It should actually be easier for distribution companies to work with five or so suppliers than twenty-two fuel assistance agencies.

### **Conclusion**

We appreciate your attention to these comments and we welcome further dialogue on these and other important program details. As discussed above, the introduction of green pricing programs in Massachusetts will have a major impact on the green power market in the state. We are optimistic that these impacts will be positive. However, we believe that MTC, DOER and, in particular, DTE must play a leadership role in the development of such programs in order to ensure that maximum potential benefits of green pricing programs are realized.

### **Distribution List:**

Tom Robinson, National Grid  
Rob Pratt, MTC  
DTE Commissioners  
Doug Horan, NSTAR  
David O'Connor, DOER  
Pat Stanton, DOER  
State Senator Michael Morrissey  
State Representative Daniel Bosley

00047

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From: "Cunningham, Gary" <Gary\_Cunningham@nstaronline.com>  
To: "Gundal, Frank" <Frank\_Gundal@nstaronline.com>  
Copies to: "Daly, James" <James\_Daly@nstaronline.com>  
Subject: RE: Sign up  
Date sent: Wed, 26 Nov 2003 13:43:12 -0500

Thank you for the reminded.

I just signed up

-----Original Message-----

**From:** Gundal, Frank

**Sent:** Wednesday, November 26, 2003 12:40 PM

**To:** Anglely, Ellen; Barsamian, Peter; Carey, Gerald; Chiara, Stephen; Connelly, Paul; Conner, Penelope; Cunningham, Gary; Daly, James; Durand, Michael; John Habib; Lea, Karen; Lehman, Dena; Milton, John; Moreira, Barbara; Olsson, Charles; Razzaboni, James; Reed, Mark; Ruscetta, Harold; Segreve, Mary Louise; Thompson, George; Weiner, Stuart; Amann, David; Boutin, Warren; Costa, Thomas; Kendrick, Howard; Lang, Luan; Le, David; McDevitt, Tracy; McDonnell, Patrick; McDonough, Barry; Postoli, Margarita; Solari, Nancy; Tavares, Charles; Van Dam, William; Zimmerman, Elaine

**Subject:** Sign up

Just a reminder, if anyone would like to be put on the waiting list...

[https://www.nstaronline.com/secure/nstarsecure2/customer\\_service/rates/nstar\\_green\\_form.asp](https://www.nstaronline.com/secure/nstarsecure2/customer_service/rates/nstar_green_form.asp)

Sincerely,  
Frank Gundal  
Sr. Engineer

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NSTAR  
One Nstar Way  
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SUM-SW340  
Ph 781-441-8151  
Fax 781-441-3191

00048

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<Peter\_Barsamian@nstaronline.com>, "Carey, Gerald"  
<Gerald\_Carey@nstaronline.com>, "Chiara, Stephen"  
<Stephen\_Chiara@nstaronline.com>, "Connelly, Paul"  
<Paul\_Connelly@nstaronline.com>, "Conner, Penelope"  
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<Michael\_Durand@nstaronline.com>, 'John Habib' <jhabib@kwplaw.com>,  
"Lea, Karen" <Karen\_Lea@nstaronline.com>, "Lehman, Dena"  
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<Howard\_Kendrick@nstaronline.com>, "Lang, Luan"  
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"McDevitt, Tracy" <Tracy\_McDevitt@nstaronline.com>, "McDonnell, Patrick"  
<Patrick\_McDonnell@nstaronline.com>, "McDonough, Barry"  
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<Charles\_Tavares@nstaronline.com>, "Van Dam, William"  
<William\_VanDam@nstaronline.com>, "Zimmerman, Elaine"  
<Elaine\_Zimmerman@nstaronline.com>  
Subject: Sign up  
Date sent: Wed, 26 Nov 2003 12:39:31 -0500

Just a reminder, if anyone would like to be put on the waiting list...

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00049

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From: "Angle, Ellen" <Ellen\_Anglely@nstaronline.com>  
To: "Conner, Penelope" <Penelope\_Conner@nstaronline.com>, "Gundal, Frank"  
<Frank\_Gundal@nstaronline.com>, "Jack Habib (E-mail)"  
<jhabib@kwplaw.com>, "Reed, Mark" <Mark\_Reed@nstaronline.com>,  
"Daly, James" <James\_Daly@nstaronline.com>, "Cunningham, Gary"  
<Gary\_Cunningham@nstaronline.com>, "Milton, John"  
<John\_Milton@nstaronline.com>  
Subject: GREEN POWER  
Date sent: Tue, 25 Nov 2003 13:04:34 -0500

AIM will file for limited intervener status and submit supporting comments in our proceeding. Angie will refer back to her comments in the technical session on Grid's program which supported multiple approaches. She believes using multiple approaches will allow us to better evaluate what works.

I'll let you know on the AG and Constellation New Energy after I talk to them.

Ellen

00050